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*Co.*, 69 Mo. 658. *The Stockport District Water Works Co. v. The Mayor, etc., of Manchester et al.*, in the English Court of Chancery, 9 Jurist N. S. 266-7 is a case in point with the principal case; the court there says in effect that the plaintiffs have no interest in the defendants' action so as to maintain a complaint against them, neither are they qualified to represent the interests of the public; "and in one of these two capacities the bill, if it can be maintained, must be supported. In neither capacity do I think the plaintiffs are entitled to call upon the court for relief."

DAMAGES—MENTAL SUFFERING UNACCOMPANIED BY PHYSICAL INJURY.—Plaintiff was occupying, under a tenancy from month to month, a house owned by defendant. Defendant entered the house before the tenancy was ended, committed various annoyances, and tried to enter the room where plaintiff was confined by ill health. No physical injury resulted. Plaintiff alleged she was "greatly disturbed." *Held*, that damages might be recovered for mental suffering resulting from the wrongful act, even though no physical injury resulted, *Nordgren v. Lawrence* (Wash. 1913), 133 Pac. 436.

It is generally held that fright alone, not resulting in physical injury of a tangible and provable nature, is not a good ground for the recovery of damages. *Ewing v. Pittsburgh C. & St. L. Ry. Co.*, 147 Pa. St. 40, 23 Atl. 340, 14 L. R. A. 666, 30 Am. St. Rep. 709; *Nelson v. Crawford*, 122 Mich. 466, 80 Am. St. Rep. 577, 81 N. W. 335; *Kalen v. Terre Haute & I. R. Co.*, 18 Ind. App. 202, 63 Am. St. Rep. 343, 47 N. E. 694; *Ohliger v. Toledo Traction Co.*, 13 Ohio Cir. Ct. 265; *Newton v. New York, N. H. & H. R. Co.*, 94 N. Y. S. 825, 106 App. Div. 415; *White v. Sander*, 168 Mass. 296, 47 N. E. 90. Humiliation is held to be a good ground of recovery in many jurisdictions, *Palmer v. Braun*, 123 Ill. App. 584; *Missouri K. & T. Ry. v. Ball*, 25 Tex. Civ. App. 500, 61 S. W. 327; as well as sorrow, *Wadsworth v. W. U. Tel. Co.*, 86 Tenn. 695; and *Louisville & Nashville R. R. Co. v. Hull*, 113 Ky. 561, 57 L. R. A. 771. In the principal case the court fails to distinguish and state the ground on which this recovery is allowed. It must, however, from the circumstances reported, be placed either on the grounds of fright or of humiliation. If the latter, the holding is within the rule generally prevailing. If fright is the basis for the recovery, then the fact that a recovery is allowed though the fright was not accompanied by any actual injury resulting from the defendant's wrongful act, places the decision outside the rule now generally followed and shows a tendency of the court to break away from the common-law principle that there must be a palpable, physical injury which is capable of proof, before recovery can be had. Upon this principle the right to recover damages for injuries caused by fright and shock has always been predicated. See also 8 MICH. L. REV. 44, 11 MICH. L. REV. 250; and *Huston v. Freemansburg*, 212 Pa. 548, 61 Atl. 1022.

DIVORCE—HUSBAND'S LIABILITY FOR SUPPORT OF HIS MINOR CHILDREN AFTER DIVORCE.—Plaintiff, who had obtained a divorce for the fault of defendant husband and was awarded the sole care, custody, and control of their child, is suing to recover the amounts necessarily paid out by her for the